

# **EXHIBIT B**

**From:** [Mitchell Epner](#)  
**To:** [Taber, Kenneth W.](#)  
**Cc:** [Madigan, Sarah M.](#); [Padro, John P.](#); [Beckerman, Brian L.](#); [DG-GP-SAFE-SSC](#)  
**Subject:** Re: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER  
**Date:** Sunday, June 30, 2024 6:35:29 PM

---

\*\*\*EXTERNAL\*\*\*

Ken,

I do not believe that it is “premature” to seek the Court’s guidance on how to present a dispute. In the absence of an agreement to submit a joint letter, I will write to the Court, attaching this exchange as an exhibit.

Please show the professionalism and decorum to agree to submit a joint letter, in the absence of a stipulated proposed order.

Sincerely,  
Mitch

Get [Outlook for iOS](#)

---

**From:** Taber, Kenneth W. <kenneth.taber@pillsburylaw.com>  
**Sent:** Sunday, June 30, 2024 6:31:48 PM  
**To:** Mitchell Epner <mepner@kudmanlaw.com>  
**Cc:** Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>; Padro, John P <JPadro@goodwinlaw.com>; Beckerman, Brian L. <brian.beckerman@pillsburylaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>  
**Subject:** Re: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

Mitch,

It is premature to write to the Court until we know whether Pillsbury and Goodwin can reach agreement on the first stipulation. We await Goodwin’s response to our Friday communication to learn whether agreement is possible.

Best,  
Ken

On Jun 30, 2024, at 6:19 PM, Mitchell Epner <mepner@Kudman law.com> wrote:

Ken,

It is not an ad hominem attack to note that you made false statements to the court. In fact, you have admitted as much.

Not is it an ad hominem attack to note that your refusal to submit a joint letter is unprofessional. I do not understand the basis on which you arrogate to yourself the right to make the first submission to the Court.

In the absence of your climbing down from your refusal, I reserve the right to send a letter to the Court this evening asking for guidance on the procedure to be followed. These emails will be an exhibit.

I will not submit the substantive dispute without guidance from the Court.

Sincerely,  
Mitch

Get [Outlook for iOS](#)

---

**From:** Taber, Kenneth W. <kenneth.taber@pillsburylaw.com>  
**Sent:** Sunday, June 30, 2024 6:13:59 PM  
**To:** Mitchell Epner <mepner@kudmanlaw.com>  
**Cc:** Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>; Padro, John P <JPadro@goodwinlaw.com>;

Beckerman, Brian L. <brian.beckerman@pillsburylaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>

**Subject:** Re: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

Mitch,

There is nothing even remotely “unprofessional” in parties submitting correspondence to the Court seriatim.

This is also now perhaps the third time you have accused me of unprofessionalism and it’s frankly becoming a little much. Let’s try to stick to the merits here and avoid *ad hominem* attacks.

Thanks,  
Ken

On Jun 30, 2024, at 6:07 PM, Mitchell Epner <mepner@kudmanlaw.com> wrote:

Ken,

Your refusal to submit a joint letter will be noted to the Court. Perhaps that will lead to yet another apology that you will be required to submit to the Court.

Your discourtesy is both unprofessional and unproductive.

Sincerely,  
Mitch

Get [Outlook for iOS](#)

---

**From:** Taber, Kenneth W. <kenneth.taber@pillsburylaw.com>

**Sent:** Sunday, June 30, 2024 6:04 PM

**To:** Mitchell Epner <mepner@kudmanlaw.com>

**Cc:** Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>; Padro, John P <JPadro@goodwinlaw.com>; Beckerman, Brian L. <brian.beckerman@pillsburylaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>

**Subject:** Re: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

Mitch,

Depending on what we hear from Goodwin, we will either reach a deal on the first stipulation or not. If we do not, we intend to make a submission to the Court on our own. Defendants can then respond.

Best,  
Ken

On Jun 30, 2024, at 5:59 PM, Mitchell Epner <mepner@kudmanlaw.com> wrote:

Ken,

I believe that both defendants have noted that the appropriate procedure, if the parties cannot reach agreement, is to submit a joint letter with each party setting forth its position.

Is SSC refusing to participate in such a joint letter?

Sincerely,  
Mitch

Get [Outlook for iOS](#)

---

**From:** Taber, Kenneth W. <kenneth.taber@pillsburylaw.com>  
**Sent:** Sunday, June 30, 2024 5:56:46 PM  
**To:** Mitchell Epner <mepner@kudmanlaw.com>  
**Cc:** Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>; Padro, John P <JPadro@goodwinlaw.com>; Beckerman, Brian L. <brian.beckerman@pillsburylaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>  
**Subject:** Re: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

Mitch,

Thank you for that explanation. We are, of course, still waiting for Goodwin's response to our letter on the first stipulation. That will then determine next steps.

Best,  
Ken

On Jun 30, 2024, at 5:53 PM, Mitchell Epner <mepner@kudmanlaw.com> wrote:

Ken,

Since the second stipulation references the first stipulation, which does not currently exist, we do not have a second stipulation.

I have no additional suggested edits to the second stipulation, other than noting that I do not believe it can be submitted in its current form.

If we do not reach a first stipulation, I will need to see what the court rules before having the ability to determine whether the current language of the second stipulation is acceptable.

Sincerely,  
Mitch

Get [Outlook for iOS](#)

---

**From:** Taber, Kenneth W. <kenneth.taber@pillsburylaw.com>  
**Sent:** Sunday, June 30, 2024 5:49:09 PM  
**To:** Mitchell Epner <mepner@kudmanlaw.com>  
**Cc:** Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>; Padro, John P <JPadro@goodwinlaw.com>; Beckerman, Brian L. <brian.beckerman@pillsburylaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>  
**Subject:** Re: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

Mitch,

Let me try to be clear: do you have any changes to the second stipulation or is the language we last sent you for that stipulation now agreed upon by the parties?

I understand that you think the two stipulations are connected, and you are certainly free to tell the Court that. But I need to tell the Court whether there remain any differences between the parties on the language of the second stipulation. I think the answer is no.

Best,  
Ken

On Jun 30, 2024, at 5:41 PM, Mitchell Epner  
<mepner@kudmanlaw.com> wrote:

Ken,

I meant the words that I wrote.

Any communication with the court should be a joint letter, with each side presenting its position. To the extent that you act in contradiction of this procedure, I request that you include this exchange as part of your (improper) submission.

Sincerely,  
Mitch

Get [Outlook for iOS](#)

---

**From:** Taber, Kenneth W.

<kenneth.taber@pillsburylaw.com>

**Sent:** Sunday, June 30, 2024 5:37:27 PM

**To:** Mitchell Epner <mepner@kudmanlaw.com>

**Cc:** Madigan, Sarah M. <sarah.madigan@pillsburylaw.com>;  
Padro, John P <JPadro@goodwinlaw.com>; Beckerman,  
Brian L. <brian.beckerman@pillsburylaw.com>; DG-GP-  
SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>

**Subject:** Re: SecurityScorecard, Inc. v. Safe Securities, Inc.,  
Case No. 1:24-cv-04240-ER

Thanks, Mitch. If we need to write to the Court about the first stipulation, we will enclose the second stipulation as well, and will advise the Court that we have at least reached agreement on the second stipulation. If that's not what you intend by your message below, though, please let us know.

Best,  
Ken

On Jun 30, 2024, at 4:03 PM, Mitchell  
Epner <mepner@kudmanlaw.com> wrote:

Ken,

As the second stipulation cross-references the first stipulation, there can be no agreement until everything is agreed upon. I have no further comments on the second stipulation.

Sincerely,  
Mitch

Mitchell Epner  
Kudman Trachten Aloe Posner LLP  
488 Madison Avenue, 23<sup>rd</sup> Floor  
New York, NY 10022  
212.868.3602 (direct)  
917.783.8280 (mobile)  
mepner@kudmanlaw.com

---

**From:** Taber, Kenneth W.  
<kenneth.taber@pillsburylaw.com>  
**Sent:** Thursday, June 27, 2024 11:06 PM  
**To:** Mitchell Epner  
<mepner@kudmanlaw.com>  
**Cc:** Madigan, Sarah M.  
<sarah.madigan@pillsburylaw.com>; Padro, John P <JPadro@goodwinlaw.com>; Beckerman, Brian L.  
<brian.beckerman@pillsburylaw.com>; DG-GP-SAFE-SSC <DG-GP-SAFE-SSC@goodwinlaw.com>  
**Subject:** Re: SecurityScorecard, Inc. v. Safe Securities, Inc., Case No. 1:24-cv-04240-ER

Mitch,

Do we have agreement on the second stipulation?

Ken

On Jun 27, 2024, at  
11:01 PM, Mitchell Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>  
wrote:

This has moved further away

from being acceptable to Ms.  
Polyakova.

Get [Outlook for iOS](#)

---

**From:** Madigan, Sarah M.  
<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>  
**Sent:** Thursday, June 27, 2024  
10:48:07 PM  
**To:** Padro, John P  
<[JPadro@goodwinlaw.com](mailto:JPadro@goodwinlaw.com)>;  
Beckerman, Brian L.  
<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>  
**Cc:** Taber, Kenneth W.  
<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>;  
Mitchell Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>;  
DG-GP-SAFE-SSC <[DG-GP-SAFE-SSC@goodwinlaw.com](mailto:DG-GP-SAFE-SSC@goodwinlaw.com)>  
**Subject:** RE: SecurityScorecard,  
Inc. v. Safe Securities, Inc., Case  
No. 1:24-cv-04240-ER

John,

Please find attached our  
revisions to your draft, in clean  
with a redline marked against  
your draft.

Please let us know if we can  
reach agreement on this draft.

Best,  
Sarah

**Sarah M. Madigan** | Associate  
Pillsbury Winthrop Shaw Pittman  
LLP  
31 West 52nd Street | New York,  
NY 10019-6131  
t +1.212.858.1169  
[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)  
| [website bio](#)

---

**From:** Padro, John P  
<[JPadro@goodwinlaw.com](mailto:JPadro@goodwinlaw.com)>  
**Sent:** Thursday, June 27, 2024  
5:13 PM  
**To:** Beckerman, Brian L.  
<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>

**Cc:** Taber, Kenneth W.  
<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>;  
Madigan, Sarah M.  
<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>;  
Mitchell Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>;  
DG-GP-SAFE-SSC <[DG-GP-SAFE-SSC@goodwinlaw.com](mailto:DG-GP-SAFE-SSC@goodwinlaw.com)>  
**Subject:** RE: SecurityScorecard,  
Inc. v. Safe Securities, Inc., Case  
No. 1:24-cv-04240-ER

Brian,

Please find our revisions to the  
proposed document  
stipulation attached (our edits  
are in track). There are also a  
few questions and comments  
in the draft. Please review and  
let us know your position.

Thanks,

**John Padro**

Goodwin Procter LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018  
o +1 212 459 7349  
f +1 212 428 6751  
[JPadro@goodwinlaw.com](mailto:JPadro@goodwinlaw.com)

<[image001.png](#)>

<[image002.png](#)>

<[image003.png](#)>

<[image004.png](#)>

<[image005.png](#)>

---

**From:** Beckerman, Brian L.  
<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>  
**Sent:** Saturday, June 22, 2024  
8:06 AM  
**To:** Padro, John P  
<[JPadro@goodwinlaw.com](mailto:JPadro@goodwinlaw.com)>;  
Mitchell Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>;  
Taber, Kenneth W.  
<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>  
**Cc:** Chatterjee, Neel  
<[NChatterjee@goodwinlaw.com](mailto:NChatterjee@goodwinlaw.com)>;  
Smith, Sharon R  
<[SharonSmith@goodwinlaw.com](mailto:SharonSmith@goodwinlaw.com)>;  
Madigan, Sarah M.  
<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>



**Subject:** RE: SecurityScorecard,  
Inc. v. Safe Securities, Inc., Case  
No. 1:24-cv-04240-ER

\*\*\*EXTERNAL\*\*\*

John,

Please see attached our revised  
Stipulation and Proposed  
Order, and a redline marked  
against the version you sent  
yesterday afternoon.

As we explained to the Court  
during the June 13 hearing, we  
are amenable to a stipulation  
that provides: “Number one,  
that all copies of these  
materials have been destroyed  
except for, number two, the  
copies that are in the  
possession of the lawyers for  
purposes of litigating the case;  
and number three, that there's a  
representation by both SAFE  
and by Ms. Polyakova that  
there are no other copies extant  
of these documents; and that  
all of that is so-ordered by the  
Court. That would not be  
difficult and would solve part  
of why we're here. Because in  
my world, a so-ordered by the  
Court is, in effect, an  
injunction that comes with  
contempt of court if, in fact, it's  
not true. And so that we would  
be able to live with as it relates  
to those documents.” June 13  
Hr'g Tr. at 54:4-20.

Your proposed changes  
eliminated key predicates for  
any such stipulation, including  
the destruction of all copies of  
the Master East List and CISO  
Prospect Lists, except for one  
“attorneys' eyes only” copy  
each, to be held by you and  
Mitch. Defendants can  
properly litigate this case if all  
other copies and extracts of the  
lists (including those in the  
possession of Digital  
Mountain, whom we do not  
control) are destroyed.

Our other changes were made  
to ensure that the stipulation  
also covers all extracts of the  
Master East List and CISO  
Prospect Lists. They also

provide for contempt of court  
if the stipulation is not  
honored.

Please let us know if we can  
reach agreement on this basis.  
If not, we will need to submit  
competing Orders to the Court.

Best,

Brian

---

**From:** Padro, John P  
<[JPadro@goodwinlaw.com](mailto:JPadro@goodwinlaw.com)>  
**Sent:** Friday, June 21, 2024 3:48  
PM  
**To:** Beckerman, Brian L.  
<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>;  
Mitchell Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>;  
Taber, Kenneth W.  
<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>  
**Cc:** Chatterjee, Neel  
<[NChatterjee@goodwinlaw.com](mailto:NChatterjee@goodwinlaw.com)>;  
Smith, Sharon R  
<[SharonSmith@goodwinlaw.com](mailto:SharonSmith@goodwinlaw.com)>;  
Madigan, Sarah M.  
<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>  
**Subject:** RE: SecurityScorecard,  
Inc. v. Safe Securities, Inc., Case  
No. 1:24-cv-04240-ER

Brian,

Please find our revisions to the  
proposed document  
stipulation attached (and a  
comparison to the version you  
sent).

Given some of our west coast  
team, could you let us know  
what would work for you after 3  
PM ET on Monday?

Thanks,

John

---

**From:** Beckerman, Brian L.  
<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>  
**Sent:** Thursday, June 20, 2024  
8:26 PM  
**To:** Mitchell Epner

<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>;

Taber, Kenneth W.

<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>

**Cc:** Padro, John P

<[JPadro@goodwinlaw.com](mailto:JPadro@goodwinlaw.com)>;

Chatterjee, Neel

<[NChatterjee@goodwinlaw.com](mailto:NChatterjee@goodwinlaw.com)>;

Smith, Sharon R

<[SharonSmith@goodwinlaw.com](mailto:SharonSmith@goodwinlaw.com)>;

Madigan, Sarah M.

<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>

**Subject:** RE: SecurityScorecard,  
Inc. v. Safe Securities, Inc., Case  
No. 1:24-cv-04240-ER

\*\*\*EXTERNAL\*\*\*

Mitch and John,

We are available to meet and  
confer tomorrow morning at 9-  
10am. Alternatively, if you  
want to send us your  
comments in writing  
tomorrow, we can then meet  
and confer Monday 9-10am.

Best,  
Brian

---

**From:** Mitchell Epner

<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>

**Sent:** Thursday, June 20, 2024  
7:09 PM

**To:** Taber, Kenneth W.

<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>

**Cc:** Beckerman, Brian L.

<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>;

John Padro

([jpadro@goodwinlaw.com](mailto:jpadro@goodwinlaw.com))

<[jpadro@goodwinlaw.com](mailto:jpadro@goodwinlaw.com)>;

[nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com);

Sharon R. Smith

([sharonsmith@goodwinlaw.com](mailto:sharonsmith@goodwinlaw.com))

<[sharonsmith@goodwinlaw.com](mailto:sharonsmith@goodwinlaw.com)>;

Madigan, Sarah M.

<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>

**Subject:** RE: SecurityScorecard,  
Inc. v. Safe Securities, Inc., Case  
No. 1:24-cv-04240-ER

Ken,

Your response taking me to  
task for my purportedly  
delayed response to your  
delayed proposed stipulation

would be better taken (but still not particularly well-taken) if it were accompanied by your response to my email of 6/18.

When will you respond to that email, which has now been pending for more than two days and alerted you to what appear to be material misstatements that you made during the hearing on June 13 before Judge Ramos? I certainly do not want to raise the issue with Judge Ramos without getting your side of the story. To date, however, you have not only failed to provide your position, but you also have failed to provide a time certain when I can expect your substantive response.

I expect that I will be able to provide you with my substantive response to your proposal tomorrow morning. I have meetings scheduled during the afternoon, so I will not be available to meet and confer between 2 – 5 pm. I will make myself before or after that time, or on Monday. I believe that you will also be receiving the response to the proposed stipulation that you sent to both defendants tomorrow. I suggest that a single time for a “meet and confer” would be best.

Sincerely,  
Mitch

Mitchell Epner  
Kudman Trachten Aloe  
Posner LLP  
488 Madison Avenue, 23<sup>rd</sup>  
Floor  
New York, NY 10022  
212.868.3602 (direct)  
917.783.8280 (mobile)

[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)

---

**From:** Taber, Kenneth W.  
<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>  
**Sent:** Thursday, June 20, 2024  
7:01 PM  
**To:** Mitchell Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>  
**Cc:** Beckerman, Brian L.  
<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>;  
John Padro  
([jpadro@goodwinlaw.com](mailto:jpadro@goodwinlaw.com))  
<[jpadro@goodwinlaw.com](mailto:jpadro@goodwinlaw.com)>;  
[nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com);  
Sharon R. Smith  
([sharonsmith@goodwinlaw.com](mailto:sharonsmith@goodwinlaw.com))  
<[sharonsmith@goodwinlaw.com](mailto:sharonsmith@goodwinlaw.com)>;  
Madigan, Sarah M.  
<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>  
**Subject:** Re: SecurityScorecard,  
Inc. v. Safe Securities, Inc., Case  
No. 1:24-cv-04240-ER

Mitch,

There is no reason you can't meet and confer with us over such a short document — which you received Tuesday afternoon — before the end of the day tomorrow. We stand ready to engage with you tomorrow on this subject.

If we do need to write to the Court about this, we have no intention of including your prior correspondence, especially because it addresses wholly extraneous topics. You will surely have an opportunity to craft your own on-point response.

We look forward to meeting and conferring with you tomorrow.

Ken

On Jun 20, 2024, at  
5:17 PM, Mitchell

Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>  
wrote:

Brian,

I am in the process of determining my response to this and your other proposed stipulated order. I do not think that setting a deadline is productive given (a) that you did not send your proposals until Tuesday afternoon (6/18) (notwithstanding the fact that the Court instructed you to send a proposal “promptly” at the end of the hearing on Thursday (6/13)), (b) yesterday (6/19) was a federal holiday, and (c) I am still awaiting a response from Mr. Taber regarding the email that I sent on 6/18 (attached), which he stated would take additional time to respond to because of “the holiday today”.

I will endeavor to respond at my earliest opportunity. If you submit your proposal to the court in advance of receiving my response, please

attach this  
correspondence  
(including the  
attached 6/18  
email notifying Mr.  
Taber of his duty  
to correct the  
misleading record  
that he appears to  
have created in his  
representations to  
the Court during  
the 6/13 hearing)  
along with the  
statement that  
“Counsel for Ms.  
Polyakova informs  
counsel for SSC  
that he is not yet in  
a position to  
respond, but will  
do so at his first  
opportunity”.

Sincerely,  
Mitch

Mitchell Epner  
Kudman  
Trachten Aloe  
Posner LLP  
488 Madison  
Avenue, 23<sup>rd</sup>  
Floor  
New York, NY  
10022  
212.868.3602  
(direct)  
917.783.8280  
(mobile)  
[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)

**Kenneth W. Taber** | Partner  
Pillsbury Winthrop Shaw Pittman  
LLP  
31 West 52nd Street | New York,  
NY 10019-6131

t +1.212.858.1813 | f  
+1.212.298.8405 | m  
+1.914.473.7977  
[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)  
| [website bio](#)

<image006.png>

[<image007.png>](#)

---

**From:** Beckerman,  
Brian L.  
<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>  
**Sent:** Thursday,  
June 20, 2024 5:05  
PM  
**To:** John Padro  
([jpadro@goodwinlaw.com](mailto:jpadro@goodwinlaw.com))  
<[jpadro@goodwinlaw.com](mailto:jpadro@goodwinlaw.com)>;  
Mitchell Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>;  
[nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com);  
Sharon R. Smith  
([sharonsmith@goodwinlaw.com](mailto:sharonsmith@goodwinlaw.com))  
<[sharonsmith@goodwinlaw.com](mailto:sharonsmith@goodwinlaw.com)>  
**Cc:** Taber, Kenneth  
W.  
<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>;  
Madigan, Sarah M.  
<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>  
**Subject:** RE:  
SecurityScorecard,  
Inc. v. Safe  
Securities, Inc.,  
Case No. 1:24-cv-  
04240-ER

Counsel—

We are following up about our stipulation and proposed order. Unless we have a response from you by 5pm tomorrow, we will advise the Court that our efforts to confer have failed and we will submit the proposed order to the Court in the same form we sent you below this past Tuesday.



Regards,

Brian

---

**From:** Beckerman,  
Brian L.  
<[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)>  
**Sent:** Tuesday, June  
18, 2024 1:32 PM  
**To:** John Padro  
([jpadro@goodwinlaw.com](mailto:jpadro@goodwinlaw.com))  
<[jpadro@goodwinlaw.com](mailto:jpadro@goodwinlaw.com)>;  
Mitchell Epner  
<[mepner@kudmanlaw.com](mailto:mepner@kudmanlaw.com)>;  
[nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com);  
Sharon R. Smith  
([sharonsmith@goodwinlaw.com](mailto:sharonsmith@goodwinlaw.com))  
<[sharonsmith@goodwinlaw.com](mailto:sharonsmith@goodwinlaw.com)>  
**Cc:** Taber, Kenneth  
W.  
<[kenneth.taber@pillsburylaw.com](mailto:kenneth.taber@pillsburylaw.com)>;  
Madigan, Sarah M.  
<[sarah.madigan@pillsburylaw.com](mailto:sarah.madigan@pillsburylaw.com)>  
**Subject:**  
SecurityScorecard,  
Inc. v. Safe  
Securities, Inc.,  
Case No. 1:24-cv-  
04240-ER

Counsel—

Pursuant to the  
Court's directive  
during the June 13  
preliminary  
injunction hearing,  
please see attached  
proposed order  
with respect to the  
destruction and  
sequestration of  
the Master East  
List and CISO  
Prospect Lists.

Please let us know  
if you have any  
comments.  
Pursuant to local  
rules, we will need  
a handwritten  
signature from  
you.

Regards,

Brian

**Brian L. Beckerman** | Counsel

Pillsbury Winthrop Shaw Pittman  
LLP

31 West 52nd Street | New York,  
NY 10019-6131

t +1.212.858.1228

[brian.beckerman@pillsburylaw.com](mailto:brian.beckerman@pillsburylaw.com)

| [website bio](#)

<image001.png>

[<image002.png>](#)

The contents of  
this message,  
together with any  
attachments, are  
intended only for  
the use of the  
individual or  
entity to which  
they are  
addressed and  
may contain  
information that  
is legally  
privileged,  
confidential and  
exempt from  
disclosure. If you  
are not the  
intended  
recipient, you are  
hereby notified  
that any  
dissemination,  
distribution, or  
copying of this  
message, or any  
attachment, is  
strictly  
prohibited. If you  
have received  
this message in  
error, please  
notify the original  
sender or the

Pillsbury  
Winthrop Shaw  
Pittman Service  
Desk at Tel: 800-  
477-0770, Option  
1, immediately by  
telephone and  
delete this  
message, along  
with any  
attachments,  
from your  
computer.  
Nothing in this  
message may be  
construed as a  
digital or  
electronic  
signature of any  
employee of  
Pillsbury  
Winthrop Shaw  
Pittman. Thank  
you.

<mime-  
attachment>

The contents of this  
message, together with any  
attachments, are intended  
only for the use of the  
individual or entity to which  
they are addressed and may  
contain information that is  
legally privileged,  
confidential and exempt  
from disclosure. If you are  
not the intended recipient,  
you are hereby notified that  
any dissemination,  
distribution, or copying of  
this message, or any  
attachment, is strictly  
prohibited. If you have  
received this message in

error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any

employee of Pillsbury  
Winthrop Shaw Pittman.  
Thank you.

\*\*\*\*\*

This message was sent from  
Goodwin Procter LLP and is  
intended only for the  
designated recipient(s). It  
may contain confidential or  
proprietary information and  
may be subject to the  
attorney-client privilege or  
other confidentiality  
protections. If you are not a  
designated recipient, you  
may not review, copy or  
distribute this message. If  
you receive this in error,  
please notify the sender by  
reply e-mail and delete this  
message. Thank you.

\*\*\*\*\*

The contents of this  
message, together with any  
attachments, are intended  
only for the use of the  
individual or entity to which  
they are addressed and may  
contain information that is  
legally privileged,  
confidential and exempt  
from disclosure. If you are  
not the intended recipient,  
you are hereby notified that  
any dissemination,  
distribution, or copying of  
this message, or any  
attachment, is strictly  
prohibited. If you have  
received this message in  
error, please notify the  
original sender or the  
Pillsbury Winthrop Shaw

Pittman Service Desk at Tel:  
800-477-0770, Option 1,  
immediately by telephone  
and delete this message,  
along with any attachments,  
from your computer. Nothing  
in this message may be  
construed as a digital or  
electronic signature of any  
employee of Pillsbury  
Winthrop Shaw Pittman.  
Thank you.

The contents of this  
message, together with any  
attachments, are intended  
only for the use of the  
individual or entity to which  
they are addressed and may  
contain information that is  
legally privileged,  
confidential and exempt  
from disclosure. If you are  
not the intended recipient,  
you are hereby notified that  
any dissemination,  
distribution, or copying of  
this message, or any  
attachment, is strictly  
prohibited. If you have  
received this message in  
error, please notify the  
original sender or the  
Pillsbury Winthrop Shaw  
Pittman Service Desk at Tel:  
800-477-0770, Option 1,  
immediately by telephone  
and delete this message,  
along with any attachments,  
from your computer. Nothing  
in this message may be  
construed as a digital or  
electronic signature of any  
employee of Pillsbury  
Winthrop Shaw Pittman.  
Thank you.

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please

notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.